From: Fogarty, Johnpc [Fogarty.Johnpc@epa.gov]

Sent: 1/9/2017 10:01:47 PM

To: Welles, Laura [Welles.Laura@epa.gov]

Subject: Re: Draft cover -- EPA revisions to draft final EPA/WFM CAFO and Appendix F (third party audit).

Ship it!

Sent from my iPhone

On Jan 9, 2017, at 4:55 PM, Welles, Laura < Welles. Laura@epa.gov > wrote:

Ok – this is long, but I wanted to cover most changes, etc. to the documents. Please review, edit, etc.

Hi John and Jennifer,

Thank you for revising the draft CAFO to reflect our discussions on 12/21/16. In reviewing the draft, we flagged a few items for minor edits. We also had a question about the corporate entities.

The minor edits/questions include:

•

Ex. 4 CBI

We just want to make sure that the CAFO captures the correct corporate entities—those that own/operate Stores covered by the CAFO.

- <!--[if !supportLists]--><!--[endif]-->In paragraph 10.d we changed the regulatory range so it only covers the CBI portion of Part 2.
- <!--[if !supportLists]--><!--[endif]-->As you'll find, we moved "Global-Level" from the footnote on page 12 to the definitions section. Since it's a definition, we thought it was consistent to place it here.

We also clarified that Global-Level changes are associated with any changes to the enhanced HW program (i.e., appendices B though E) and not the third party audit or SEP (Appendices F and G). See changes to definition of Global-Level and paragraph 30. We hope this makes sense to you.

- <!--[if !supportLists]--><!--[endif]-->Paragraph 38 contains language that refers to the SEP in Appendix G.
- <!--[if !supportLists]--><!--[endif]-->Paragraph 42, last sentence we changed to "both" to "the" to reflect that it could be more than EPA and one Respondent.

Also attached is the draft Appendix F or third party audit. As you'll find, we made a few changes to this document. They include:



Please review the above changes to the draft final CAFO and Appendix F and let us know if you have any questions/concerns or would like to discuss them further.

Thanks,
Laura
Laura Welles
Attorney Advisor
Waste and Chemical Enforcement Division
Office of Civil Enforcement
U.S. Environmental Protection Agency
(202) 564-2754

<USEPA - WFM CAFO (Final Draft- 1-5-17) (00014251xD64DF)_EPA edits and comments_1-9-17.docx>

<USEPA CAFO Appendix F (00014296xD64DF)_EPA edits and comments_1-9-17.docx>